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November 13, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex parte* presentation in GN Docket No. 16-142

Dear Ms. Dortch:

On November 8, 2017, Anne Schelle, Managing Director of Pearl TV; Sandhi Kozsuch, Principal of Cox Media Group; Emily Barr, President and CEO of Graham Media Group; Jordan Wertlieb, President of Hearst Television; and the undersigned met with Chairman Pai and Media Advisor Alison Nemeth; Commissioner O'Rielly and Chief of Staff Brooke Ericson; Commissioner Carr and Acting Legal Advisor Nirali Patel; Commissioner Rosenworcel and Policy Advisor Kate Black; and Holly Sauer, Legal Advisor to Commissioner Clyburn, to discuss the adoption of a Next Gen TV standard in the above-captioned proceeding. Pearl TV is a partnership of eight of the largest broadcast companies in America, and is dedicated to enhancing the future of television broadcasting. We are excited to bring the significant benefits Next Generation TV promises to viewers.

The parties discussed several issues raised by the draft ATSC 3.0 order. In particular, we stressed that Pearl members intend to keep their primary ATSC 1.0 signal in high definition during the transition for two equally important reasons. One is that consumers expect this programming to be in high definition, and second, network affiliation agreements as well as other programming agreements generally require network programming be transmitted in HD. Pearl believes that mandates are unnecessary given these market incentives, and that there is no need for FCC action in the absence of a finding that consumers are likely to be harmed. We also made the point that a strict simulcast requirement can act as a governor on innovation, and instead urged the Commission to use a "comparable" standard for the 3.0 signal. Lastly, we urged the Commission to be mindful that this transition is going to be broadcaster led and so the rules should have flexibility on the coverage area and also with respect to consumer education efforts, since broadcasters know very well how to effectively deliver messages to their audiences.

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Please direct any questions to the undersigned.

Respectfully submitted,

/s/
Gerard J. Waldron
Counsel to Pearl TV

cc: Meeting attendees